

March 3, 2019

Motion Letter

TO: Judge Kaplan, District Court Judge
Southern District of New York

From: Wadiah EL-Hage, Case NO. 98 Cr. 1023 (LAK)

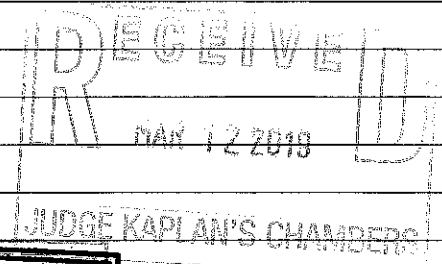
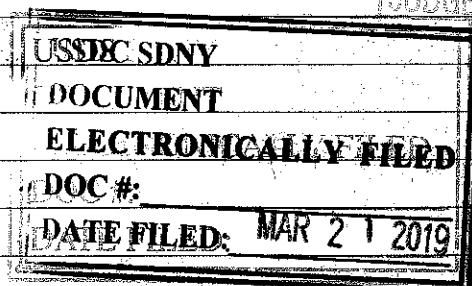
Dear Judge Kaplan

- ① I have been incarcerated in Solitary Confinement since Sep. 16, 1998.
- ② The government imposed the Special Administrative Measures (SAMs) on me since Nov. 1998.
- ③ Justifying this Prolonged Solitary Confinement and SAMs, the government claims I have: "Proclivity for violence" and "risk of death or serious bodily injury to persons".
- ④ If the government's claims have any merits, then I should qualify for a relief under the recent S. Ct. Dimaya case (138 ~~U.S.~~ S. Ct. 1204, 2018).

Thank You

Sincerely

Wadiah EL-Hage

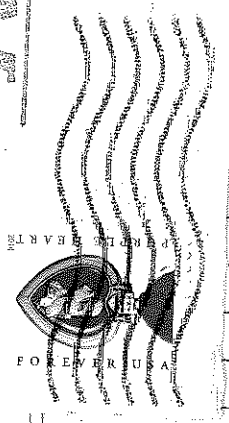


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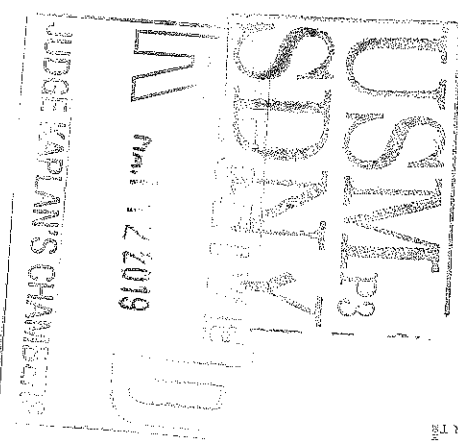
Name: Madib El-Hage
Reg No: 42393-054
U.S. Penitentiary MAX
P.O. Box 9500
Florence, CO, 81226-9500

Legal Matter

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To: Judge Lewis Kaplan
United States District Judge
500 Pearl Street
New York, NY 10007



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JUDGE KAPLAN'S CHAMBERS

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